

# *Environmental Management Plan for:*

December 2020

*Subdivision of Erf 53,  
Omuthiya and the Creation  
of Streets, Omuthiya,  
Oshikoto Region.*

**APP-002224**

Prepared for: Omuthiya Town Council  
Po Box: PO Box 19262, Omuthiya  
Contact Number: +264 65 244700  
Contact Person: Mr. S.P. Hango  
Email: [spmbango@omuthiyatc.com.na](mailto:spmbango@omuthiyatc.com.na)



Prepared by: Stubenrauch Planning Consultants  
P.O. Box 41404, Windhoek  
Contact Person: Bronwynn Basson  
Contact Number: +264 (61) 25 11 89  
Fax Number: +264 (61) 25 11 89  
Email: [bronwynn@spc.com.na](mailto:bronwynn@spc.com.na)



**Report**  
**Version – FINAL**

Omuthiya Town Council

**PROJECT DETAILS**

<b>Title</b>	ENVIRONMENTAL MANAGEMENT PLAN FOR THE FOLLOWING DEVELOPMENT ACTIVITIES IN OMUTHIYA:		
	<ul style="list-style-type: none"> <li>• <b>Subdivision of Erf 53, Omuthiya and the Creation of Streets, Omuthiya, Oshikoto Region</b></li> </ul>		
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<b>Proponent</b>	Omuthiya Town Council P.O. Box 19262 Omuthiya, Namibia Phone: (065) 244-700 Fax: (065) 244-730 Email: <a href="mailto:daisrael@omuthiyatc.org.na">daisrael@omuthiyatc.org.na</a>		
<b>Report date</b>	December 2020		
	<b>Name</b>	<b>Signature</b>	<b>Date</b>
<b>Author(s)</b>	Stephanie Strauss		December 2020

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**ABBREVIATIONS**

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AIDS	Acquired Immuno-Deficiency Syndrome
DR	Developer 's Representative
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
I&APs	Interested and Affected Parties
NBRI	National Botanical Research Institute
NHCN	National Heritage Council of Namibia
OTC	Omuthiya Town Council
Reg.	Regulation
S	Section
TB	Tuberculosis

## 1 INTRODUCTION

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Omuthiya is a settlement located in north-central Namibia within the Oshikoto Region. Omuthiya has experienced a rapid growth in population over the past few years. This was mainly as a result of the town's status as the seat of the Oshikoto Regional Council. Erf 53 Omuthiya was created to accommodate a number of formal and informal structures erected prior to the town's declaration as a local authority. While most of the structures belong to prominent individuals who have contributed to the development of Omuthiya, the land ownerships still vest with the Town Council. These people intend to obtain freehold ownership of the land to enable them access to funding for further development. In addition, many of the structures were erected over the main NamWater pipeline running across the property. The Omuthiya Town Council (OTC) therefore resolved to formalise the existing situation by undertaking the following activities:

- **The subdivision of Erf 53 Omuthiya and the creation of Streets.**

Stubenrauch Planning Consultants (SPC) has been appointed to update this Environmental Management Plan (EMP) as part of the scoping EA process conducted for the proposed developments. Regulation 8 of the Environmental Management Act's (EMA) (7 of 2007) Environmental Impact Assessment Regulations (2012) requires that a draft EMP should be included within a scoping report.

An EMP is one of the most important outputs of the EA process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of these developments:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of erven, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- Construction – the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the development of services infrastructure and construction of the road to service the development as well as any other construction process(s) within the development areas;
- Operation and Maintenance – the period during which the services infrastructure will be fully functional and maintained.

It should be noted that to date, no engineering designs have been carried out for the development of the infrastructure associated with this development.

The decommissioning of these developments is not envisaged; however in the event that this should be considered some recommendations have been outlined in **Table 3-5**.

**1.1 PROJECT LOCATION**

Omuthiya is located in north-central Namibia; it is the seat of the Oshikoto Regional Council Region. Erf 53 Omuthiya is located in the centre of Omuthiya town and is adjacent to the B1 from Oshivelo to Ondangwa on the north east. Refer to **Figure 1** for locality map of Omuthiya town and **Figure 2** below for the locality map of Erf 53 Omuthiya.



**Figure 1-1:** Locality map of Omuthiya

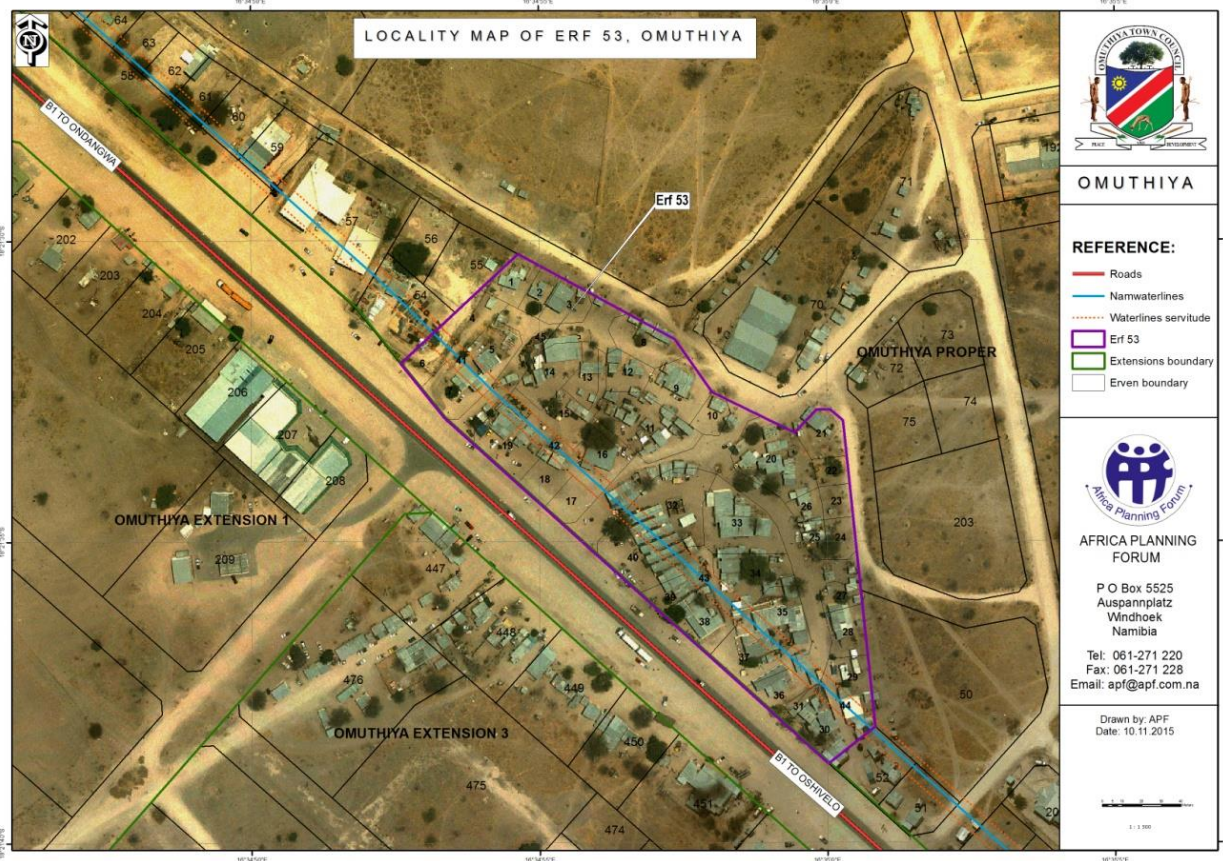


Figure 1-2: Locality map of proposed development (APF, 2015)

1.2 Project Description

The layout design of Erf 53, Omuthiya is based on the following aspects as depicted in **Table 1-1** below; also see **Figure 1-3** for the Zoning Map of Erf 53 Omuthiya:

Table 1-1: Zonings for Erf 53 Omuthiya

Zoning	Erf 53 Omuthiya
Business	35
Local Authority	5
Public Open Space	4
Street	2
<b>TOTAL</b>	<b>46</b>



Figure 1-3: Zoning map for the proposed Omuthiya development (SPC, 2014)

The area on which the proposed development will be planned is currently zoned as Business in accordance with the Omuthiya Town Planning Scheme. It is the intention of Omuthiya Town Council to plan and formalise the structures on Erf 53 Omuthiya by subdividing the erf into 45 erven and Remainder including the creation of streets.

### 1.3 Water, Sewer, Electricity and Stormwater

The proposed subdivided erven will be connected to the bulk water network servicing the town. These individual water lines which are randomly connected to main lines will have to be replaced as they are not up to standard as set by the local authority. It is anticipated that the new developments of Erf 53 will be connected to the existing sewer lines in Omuthiya. The services will be upgraded to cater for the proposed development. It is expected that the Omuthiya Town Council, in consultation with NORED will be in a position to provide for electricity services to the proposed development.

### 1.4 Access Provision

It is proposed that access to the development will be obtained from the B1 Oshivelo - Ondangwa Main Road at two points. Additional direct access onto the B1 has been approved by the Roads Authority from erven 6, 30, 38, and 39. The accesses will have to be designed and constructed to the standards and specifications of the Roads Authority. The internal road network where required will be constructed according to the approved layout.



## 2 ROLES AND RESPONSIBILITIES

The proponent (Omuthiya Town Council) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase (if these developments are in future decommissioned) of these developments. The proponent will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Developer's Representative;
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

### 2.1 DEVELOPER'S REPRESENTATIVE

Omuthiya Town Council should assign the responsibility of managing all aspects of these developments for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Developer's representative (DR). Omuthiya Town Council may decide to assign this role to one person for the full duration of these developments, or may assign a different DR to each of the development phases – i.e. one for the planning and design phase, one for the construction phase and one for the operation and maintenance phase. The DR's responsibilities are as follows:

**Table 2-1** Responsibilities of DR

Responsibility	Project Phase
Making sure that the necessary approvals and permissions laid out in <b>Table 3-1</b> are obtained/adhered to.	Throughout the lifecycle of these developments
Making sure that the relevant provisions detailed in <b>Table 3-2</b> are addressed during planning and design phase.	Planning and design phase
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation and maintenance</li> </ul>
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation and maintenance</li> </ul>

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## 2.2 ENVIRONMENTAL CONTROL OFFICER

The DR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the construction and operation and maintenance phases to a designated member of staff, referred to in this EMP as the Environmental Control Officer (ECO). The DR/Omuthiya Town Council may decide to assign this role to one person for both phases, or may assign a different ECO for each phase. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between Omuthiya Town Council, DR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is monthly) of all construction and/or infrastructure maintenance areas with respect to the implementation of this EMP (monitor and audit the implementation of the EMP);
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the DR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the DR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to this document.

## 2.3 CONTRACTOR

Contractors appointed by Omuthiya Town Council are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 3-3** applies to contractors appointed during the construction phase and **Table 3-4** to those appointed during the operation and maintenance phase. In order to ensure effective environmental management the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation and maintenance work.

The tables in the following chapter (**Chapter 3**) detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

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## 3 MANAGEMENT ACTIONS

The aim of the management actions in this chapter of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

The following tables provide the management actions recommended to manage the potential impacts rated in the scoping-level EA conducted for these developments. These management actions have been organised temporally according to project phase:

- Applicable legislation (**Table 3-1**);

- Planning and design phase management actions (**Table 3-2**);
- Construction phase management actions (**Table 3-3**);
- Operation and maintenance phase management actions (**Table 3-4**); and
- Decommissioning phase management actions (**Table 3-5**).
- The proponent should assess these **commitments** in detail and should acknowledge their commitment to the specific management actions detailed in the tables below.

### 3.1 ASSUMPTIONS AND LIMITATIONS

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level Environmental Assessment (EA) conducted for the subdivision and creation of streets on Erf 53 as represented in **Figure 6** of the EA report. SPC will not be held responsible for the potential consequences that may result from any alterations to the above-mentioned layout.
- It is assumed that construction labourers will be sourced mostly from the Omuthiya townlands area and that migrant labourers (if applicable) will be housed in established accommodation facilities within the townlands.
- No engineering designs have been carried out for the development of the associated services infrastructure (roads, potable water, storm water, sewerage and electrical reticulations).

### 3.2 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of these developments are listed in **Table 3-1** below. The legal instrument, applicable corresponding provisions and project relevance details are provided.

**Table 3-1:** Legal provisions relevant to the proposed development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.”  Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	The development should be informed by the EMA.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	<b>Activity 10.1 (b)</b> The construction of public roads. <b>Activity 10.2 (a)</b> The route determination of roads and design of associated physical infrastructure where it is a public road
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.
Water Resources Management Act No. 11 of 2013	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.	The pollution of water resources should be avoided during construction and operation of the development.
The Ministry of Environment and Tourism (MET) Policy on HIV & AIDS	MET has recently developed a policy on HIV and AIDS. In addition it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor must adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when migrant construction workers interact with local communities.
Township and Division of Land Ordinance 11 of 1963	The Townships and Division of Land Ordinance regulates subdivisions of portions of land falling within a Local Authority area	In terms of Section 19 such applications is to be submitted to NAMPAB and Townships Board respectively.
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Town or Municipal Council.	The development has to comply with provisions of the Local Authorities Act
Labour Act No. 11 of 2007	<b>Chapter 2</b> details the fundamental rights and protections. <b>Chapter 3</b> deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated.
Roads Ordinance 17 of 1972	<ul style="list-style-type: none"> <li>Section 3.1 deals with width of proclaimed roads and road reserve boundaries</li> <li>Section 27.1 is concerned with the control of traffic on urban trunk and main roads</li> <li>Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads</li> <li>Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads.</li> </ul>	Adhere to all applicable provisions of the Roads Ordinance.
Public and Environmental Health Act of 2015	Section 119 prohibits persons from causing nuisance.	Contractors and users of the proposed development are to comply with these legal requirements.
Nature Conservation Ordinance no. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants have to be managed within the legal confines.
Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EIA considers this term of Environment.
Water Quality Guidelines for Drinking Water and Waste Water Treatment	Details specific quantities in terms of water quality determinants, which waste water, should be treated to before being discharged into the environment (see <b>Appendix A</b> ).	These guidelines are to be applied when dealing with water and waste treatment.

### 3.3 PLANNING AND DESIGN PHASE

The DR should ensure that the management actions detailed below should be adhered to during the period before the construction of the services infrastructure starts.

**Table 3-2:** Planning and design management actions

Aspect	Management Actions
Storm water	<p>The Developer should appoint a professional engineer to design a detailed storm water management system as part of the infrastructure service provision for the developments. The system should as a minimum address the following:</p> <ul style="list-style-type: none"> <li>• Existing storm water infrastructure should be upgraded in line with the design of the storm water management system.</li> <li>• Canalising of run-off with concrete should be avoided as far as possible and natural run-off surfaces utilised or enhanced.</li> <li>• Where feasible and practical permeable/natural road shoulder and other run-off surfaces should be considered – minimise paved or impermeable areas.</li> <li>• Run-off from areas where surface water might become contaminated should be captured, detained and treated to sewage effluent standards.</li> </ul>
Roads	<ul style="list-style-type: none"> <li>• Make ample provision in road design for pedestrian walkways and crossing especially near schools and busy/business nodes</li> <li>• Access roads to be designed and constructed to the standards and specifications of the Roads Authority.</li> </ul>
Wate Water	<p>The Developer should appoint a professional engineer to design the required aspects for the wastewater. These designs should consider as a minimum the following:</p> <ul style="list-style-type: none"> <li>• Sewerage lines should not be laid within river channels.</li> <li>• Sewer pipes should avoid crossing rivers. Where this is not possible the design should comply with the South African Bureau of Standards 1200 for sewer pipe designs.</li> </ul>
Borrow pits	Building sand should be sourced from a borrow pit with a valid ECC.

### 3.4 CONSTRUCTION PHASE

The management actions listed in **Table 3-3** applies during the construction phase. This table may be used as a guide when developing EMPs for other construction activities within these development areas.

**Table 3-3:** Construction phase management actions

Environmental Feature	Impact	Management Actions
EMP training	Lack of EMP awareness and the implications thereof	<p>All construction workers are to undergo EMP training that should include as a minimum the following:</p> <ul style="list-style-type: none"> <li>• Explanation of the importance of complying with the EMP.</li> <li>• Discussion of the potential environmental impacts of construction activities.</li> <li>• Employees’ roles and responsibilities, including emergency preparedness.</li> <li>• Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities.</li> </ul>
Conservation of vegetation	Loss of biodiversity	<ul style="list-style-type: none"> <li>• The layout and development design should incorporate existing trees<sup>1</sup>.</li> <li>• The Contractor should compile a Tree Management Plan which should include the following as a minimum: <ul style="list-style-type: none"> <li>○ Trees if not already accounted for in an existing Geographic Information System (GIS), should be surveyed, co-ordinates/location incorporated into the Contractor’s GIS, marked with paint (or other means so as to be readily visible) and protected;</li> <li>○ Trees, which are impossible to conserve, need to be identified and their location recorded on a map;</li> <li>○ The Contractor should apply to the local authority for a permit to remove these trees.</li> <li>○ Special protection should be accorded the following protected tree species, which are likely to be found within the townlands: the marula (<i>Sclerocarya birrea</i>), bird plum (<i>Berchemia discolor</i>), mopane (<i>Colophospermum mopane</i>) and Baobab tree (<i>Adansonia digitata</i>).</li> </ul> </li> </ul>

<sup>1</sup>a “tree” is defined as an indigenous woody perennial plant with a trunk diameter ≥150 mm

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>○ A list should be compiled of all trees to be removed detailing the erf on which they are located, the species as well as which trees will be planted to replace these. The nursery where these trees will be sourced from should also be included;</li> <li>○ Each tree that is removed needs to be replaced with an indigenous tree species after construction;</li> <li>○ Some of these trees can be obtained at the nearest forestry office or at a commercial nursery (most of these are located in Windhoek). Assistance can be sought from the nearest forestry office regarding nearby nurseries where additional trees may be bought.</li> <li>● Only a limited width +/- 5 m on the side of roads may be partially cleared of vegetation.</li> <li>● Workers are prohibited from collecting wood or other plant products on or near work sites.</li> <li>● No alien species may be planted on or near work areas</li> </ul>
Lay-down areas and materials camp	Loss of biodiversity	<p>Suitable locations for the contractors lay-down areas and materials camp should be identified with the assistance of the DR and the following should be considered in selecting these sites:</p> <ul style="list-style-type: none"> <li>● The areas designated for the services infrastructure should be used as far possible.</li> <li>● Second option should be degraded land.</li> <li>● Avoid sensitive areas (e.g. rivers/drainage lines).</li> </ul>
Hazardous waste	Contamination of surface and groundwater sources.	<ul style="list-style-type: none"> <li>● All heavy construction vehicles and equipment on site should be provided with a drip tray.</li> <li>● All heavy construction vehicles should be maintained regularly to prevent oil leakages.</li> <li>● Maintenance and washing of construction vehicles should take place only at a designated workshop area.</li> <li>● Spilled cement and/or concrete (wet or dry) should be treated as hazardous waste and disposed of by the end of each day in the appropriate hazardous waste containers.</li> </ul>



Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• All hazardous substances (e.g. fuel etc.) or chemicals should be stored in a specific location on an impermeable surface that is bunded - with a volume of 120 % of the largest single storage container or 25 % of the total storage containers, whichever is greater</li> </ul>
Water, Sewage and grey water	Contamination of surface and groundwater sources and water wasting	<ul style="list-style-type: none"> <li>• Sewage should not be discharged directly onto open soil.</li> <li>• All sewage must be removed regularly and disposed of at a recognised (municipal) sewage treatment facility.</li> <li>• The wash water (grey water) collected from the cleaning of equipment on-site should not be left standing for long periods of time as this promotes parasite and bacterial proliferation. Grey water should be recycled:               <ul style="list-style-type: none"> <li>○ Used for dust suppression;</li> <li>○ Used to water a vegetable garden, or to support a small nursery;</li> <li>○ Used (reused) to clean equipment.</li> </ul> </li> <li>• Grey water that is not recycled should be removed along with sewage on a regular basis.</li> </ul>
General waste	Visual impact and soil contamination	<ul style="list-style-type: none"> <li>• The construction site should be kept tidy at all times. All domestic and general construction waste produced on a daily basis should be cleaned and contained daily.</li> <li>• No waste may be buried or burned.</li> <li>• Waste containers (bins) should be emptied regularly and removed from site to a recognised (municipal) waste disposal site. All recyclable waste needs to be taken to the nearest recycling depot where practical.</li> <li>• A sufficient number of separate bins for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such.</li> <li>• Construction labourers should be sensitised to dispose of waste in a responsible manner and not to litter.</li> <li>• No waste may remain on site after the completion of the project</li> </ul>

Environmental Feature	Impact	Management Actions
Construction waste		<ul style="list-style-type: none"> <li>• Building rubble should be regularly removed from the site and disposed of at the municipal building rubble dumping site.</li> <li>• The contractor should be responsible for the removal and disposal of building rubble in a safe and responsible manner.</li> </ul>
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> <li>• When excavations are carried out, topsoil<sup>2</sup> should be stockpiled in a demarcated area.</li> <li>• Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile.</li> </ul>
Rehabilitation	Visual impact	<ul style="list-style-type: none"> <li>• Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post-construction use of remaining excavated areas (if applicable).</li> <li>• In the event that no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows: <ul style="list-style-type: none"> <li>○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill.</li> <li>○ Rehabilitated excavated areas need to match the contours of the existing landscape.</li> <li>○ The rehabilitated area should not be higher (or lower) than nearby drainage channels. This ensures the efficiency of revegetation and reduces the chances of potential erosion.</li> <li>○ Topsoil is to be spread across excavated areas evenly.</li> <li>○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall.</li> <li>○ Ripping should be done along slopes, not up and down a slope, which could lead to enhanced erosion.</li> </ul> </li> </ul>

<sup>2</sup> Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.

Environmental Feature	Impact	Management Actions
HIV/AIDS and TB training	Lack of awareness regarding implications of risky behaviour	The Contractor should approach the Ministry of Health and Social Services to co-opt a health officer to facilitate HIV/AIDS and TB education programmes periodically on site during the construction phase.
Road safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• Demarcate roads clearly.</li> <li>• Off-road driving should not be allowed.</li> <li>• All vehicles that transport materials to and from the site must be roadworthy.</li> <li>• Drivers that transport materials should have a valid driver’s license and should adhere to all traffic rules.</li> <li>• Loads upon vehicles should be properly secured to avoid items falling off the vehicle.</li> </ul>
Safety around work sites	Injury or loss of life	<ul style="list-style-type: none"> <li>• Excavations should be left open for the shortest time possible.</li> <li>• Excavate short lengths of trenches and box areas for services or foundations in a manner that will not leave the trench unattended for more than 24 hours.</li> <li>• Demarcate excavated areas and topsoil stockpiles with danger tape.</li> <li>• All building materials and equipment are to be stored only within set out and demarcated work areas.</li> <li>• Only road construction personnel will be allowed within these work areas.</li> <li>• Comply with all waste related management actions stated above in this table.</li> <li>• A qualified traffic controller should be onsite always to direct the movement of other passenger vehicles as construction will be on-going.</li> </ul>
Ablutions	Non-compliance with Health and Safety Regulations	<ul style="list-style-type: none"> <li>• Separate toilets should be available for men and women and should clearly be indicated as such.</li> <li>• Portable toilets (i.e. easily transportable) should be available at every construction site:                             <ul style="list-style-type: none"> <li>○ 1 toilet for every 15 females.</li> <li>○ 1 toilet for every 30 males.</li> </ul> </li> </ul>

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• Sewage needs to be removed on a regular basis to an approved (municipal) sewage disposal site. Alternatively, sewage may be pumped into sealable containers and stored until it can be removed.</li> <li>• Workers responsible for cleaning the toilets should be provided with environmentally-friendly detergents, latex gloves and masks.</li> </ul>
Open fires	Injury or loss of life	No open fires may be made anywhere on site.
General health and safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• A fully stocked first aid kit should permanently be available on-site as well as an adequately trained member of staff capable of administering first aid.</li> <li>• All workers should have access to the relevant personal protective equipment (PPE).</li> <li>• Sufficient potable water reserves should be available to workers at all times.</li> <li>• No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable).</li> <li>• No workers should be allowed to drink alcohol during work hours.</li> <li>• No workers should be allowed on site if under the influence of alcohol.</li> <li>• Building rubble and domestic waste should be stored in skips.</li> <li>• Condoms should be accessible/ available to all construction workers.</li> <li>• Access to Antiretroviral medication should be facilitated.</li> </ul>
Dust	Nuisance and health impacts	<ul style="list-style-type: none"> <li>• A watering truck should be used on gravel roads with the most heavy vehicle movement especially during dry and windy conditions. However, due consideration should be given to water restrictions during times of drought.</li> <li>• The use of waterless dust suppression means (e.g. lignosulphonate products such as Dustex) should be considered.</li> <li>• Cover any stockpiles with plastic to minimise windblown dust.</li> </ul>

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• Dust protection masks should be provided to workers if they complain about dust.</li> </ul>
Noise	Nuisance impacts	<p>Work hours should be restricted to between 08h00 and 17h00 where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week’s written notice.</p>
Recruitment of labourers	Negative conflict regarding recruitment	<p>The Contractor should compile a formal recruitment process including the following provisions as a minimum:</p> <ul style="list-style-type: none"> <li>• Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME’s, etc.).</li> <li>• Recruitment should not take place at construction sites.</li> <li>• Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside these agreed upon procedures.</li> <li>• Contractors should give preference in terms of recruitment of sub-contractors and individual labourers to those who are qualified and from the project area and only then look to surrounding towns.</li> <li>• Clearly explain to all job-seekers the terms and conditions of their respective employment contracts (e.g. period of employment etc.) – make use of interpreters where necessary.</li> </ul>
Communication plan	Negative conflict with I&APs	<p>The Contractor or proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> <li>• How Interested and Affected Parties (I&amp;APs), who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records.</li> </ul>

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• How these I&amp;APs will be consulted on an ongoing basis.</li> <li>• Make provision for grievance mechanisms – i.e. how concerns can be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed unsatisfactory.</li> </ul>
General communication	Negative conflict with I&APs	<ul style="list-style-type: none"> <li>• The DR must appoint an ECO to liaise between the Contractor, I&amp;APs, Developer.</li> <li>• The Contractor shall at every monthly site meeting report on the status of the implementation of all provisions of the EMP.</li> <li>• The Contractor should implement the EMP awareness training as stipulated above in this table.</li> <li>• The Contractor must list the I&amp;APs of the project and their contact details with whom ongoing communication would be required for the duration of the contract. This list, together with the Communication Plan must be agreed upon and given to the DR before construction commences.</li> <li>• The Communication Plan, once agreed upon by the Developer, shall be legally binding.</li> <li>• All communication with the I&amp;APs must take place through the ECO.</li> <li>• A copy of the EMP must be available at the site office and should be accessible to all I&amp;APs.</li> <li>• Key representatives from the above mentioned list need to be invited to attend monthly site meetings to raise any concerns and issues regarding project progress.</li> <li>• The Contractor should liaise with the Developer regarding all issues related to community consultation and negotiation before construction commences.</li> <li>• A procedure should be put in place to ensure that concerns raised have been followed-up and addressed.</li> </ul>

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• All people on the I&amp;APs list should be informed about the availability of the complaints register and associated grievance mechanisms in writing by the DR prior to the commencement of construction activities.</li> </ul>
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> <li>• Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below:               <ul style="list-style-type: none"> <li>○ If operating machinery or equipment, stop work;</li> <li>○ Demarcate the site with danger tape;</li> <li>○ Determine GPS position if possible;</li> <li>○ Report findings to the construction foreman;</li> <li>○ Report findings, site location and actions taken to superintendent;</li> <li>○ Cease any works in immediate vicinity;</li> <li>○ Visit site and determine whether work can proceed without damage to findings;</li> <li>○ Determine and demarcate exclusion boundary;</li> <li>○ Site location and details to be added to the project’s Geographic Information System (GIS) for field confirmation by archaeologist;</li> <li>○ Inspect site and confirm addition to project GIS;</li> <li>○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and</li> <li>○ Recovery, packaging and labelling of findings for transfer to National Museum.</li> </ul> </li> <li>• Should human remains be found, the following actions will be required:               <ul style="list-style-type: none"> <li>○ Apply the chance find procedure as described above;</li> <li>○ Schedule a field inspection with an archaeologist to confirm that remains are human;</li> <li>○ Advise and liaise with the NHCN and Police; and</li> </ul> </li> </ul>

Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>○ Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.</li> </ul>

### 3.5 OPERATION AND MAINTENANCE PHASE

The management actions included in **Table 3-4** below apply during the operation and maintenance phase of these developments.

**Table 3-4: Operation and maintenance management actions**

Environmental Feature	Impact	Management Actions
EMP training	Lack of EMP awareness and the implications thereof	All contractors appointed for maintenance work on the respective services infrastructure must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work.
Property development	EMP non-compliance	The Property Development EMP (see <b>Appendix A</b> ) should be included as part of the title deed for every erf sold.
Monitoring	EMP non-compliance	The ECO should monitor the implementation of the Property Development EMP: <ul style="list-style-type: none"> <li>• The ECO should inspect the site before construction starts; and</li> </ul> The ECO should inspect the site at the end of the construction period.
Water	Surface and groundwater contamination	Ensure that all properties are connected to the municipal water and wastewater reticulation.
Aesthetics	Visual impacts	The OTC should draft development guidelines which address the following as a minimum: <ul style="list-style-type: none"> <li>• The use of 'green' technologies within the architectural designs and building materials of the development.</li> </ul> The incorporation of indigenous vegetation, natural colours and building materials such as wood and stone into property development.
Energy efficiency	Waste of scarce resources	The OTC should draft development guidelines which address the following as a minimum:



Environmental Feature	Impact	Management Actions
		<ul style="list-style-type: none"> <li>• The use of solar geysers and solar panels for the provision of general lighting and heating of water and offices.</li> <li>• Use of designs and building materials, which reduce dependency on artificial heating and cooling.</li> </ul> <p>The incorporation of water saving initiatives within the development’s design and plans in order to reduce water demands.</p>
Noise	Noise nuisance impact	The OTC should draft guidelines to manage the generation of noise in residential areas.

### 3.6 DECOMMISSIONING PHASE

The decommissioning of these developments is not foreseen as this subdivision and street creation is envisaged to be permanent. In the event that this infrastructure development is decommissioned the following management actions should apply.

**Table 3-5: Decommissioning phase management actions**

Environmental Feature	Management Actions
Deconstruction activity	Many of the mitigation measures prescribed for construction activity for these developments ( <b>Table 3-3</b> above) would be applicable to some of the decommissioning activities. These should be adhered to where applicable.
Rehabilitation	In the event that decommissioning is deemed necessary, excavations need to be rehabilitated according to the management actions laid out in <b>Table 3-3</b> above.

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**Appendix A - Property Development Environmental Management Plan**

Environmental feature	Mitigation measure
Conservation of vegetation	<ul style="list-style-type: none"> <li>• All trees listed (with co-ordinates provided) in the title deed for this erf should be conserved as far as practicably possible. These trees should be incorporated into the planning layout of any structures to be erected on this erf.</li> <li>• Where listed trees cannot be accommodated by the planned structures to be built, written motivation should be submitted to the OTC requesting permission to remove such trees. Only once a permit has been received from the OTC may the owner of the erf remove affected trees.</li> </ul>
Health and safety	<ul style="list-style-type: none"> <li>• No human waste may be expelled on open soil. Every construction site should have at least one portable toilet.</li> <li>• Only one or two security guards may reside/sleep on-site during construction. No other construction personnel may sleep/reside on-site.</li> <li>• No open fires may be made anywhere on-site during the construction period. Heating and cooking facilities (where necessary/applicable) should be provided by the Contractor.</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>• The waste container of portable toilets should be emptied on a regular basis to avoid overflows. Waste from portable toilets should be removed to the OTC wastewater treatment facility.</li> <li>• All waste should be placed in the appropriate waste containers on a daily basis.</li> <li>• All waste on-site should be removed on a weekly basis.</li> <li>• Concrete should not be mixed on open soil. Concrete should be mixed on an impermeable (i.e. lined) surface.</li> </ul>

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**APPENDIX B: Water Quality Guidelines for Drinking Water and Waste Water Treatment**